

# EXHIBIT A

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

-----  
WAYMO LLC, )  
Plaintiff, )  
vs. ) Case No.  
UBER TECHNOLOGIES, INC., ) 3:17-cv-00939-WHA  
OTTOMOTTO LLC; OTTO )  
TRUCKING LLC, )  
Defendants. )  
-----)

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VIDEOTAPED DEPOSITION OF DANIEL CHU

San Francisco, California

Monday, April 3, 2017

Volume I

Reported by:

SUZANNE F. GUDELJ, CSR No. 5111

Job No. 2583707

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1 THE WITNESS: So it's -- it's probably a --  
2 a growing -- growing list of folks, but the folks  
3 that we'd probably look at most are -- are Uber in  
4 terms of their self-driving efforts. We also look  
5 at, for instance, Tesla in terms of some of their -- 10:06:20  
6 their efforts there.

7 BY MR. GONZALEZ:

8 Q Would you agree that your number one  
9 competitor in the market is Uber?

10 MS. BAILY: Object to form. 10:06:28

11 THE WITNESS: I think it depends what  
12 you -- [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]. 10:06:39

16 BY MR. GONZALEZ:

17 Q All right. Let me focus on -- on your  
18 words. I'll use your words.

19 [REDACTED]

20 [REDACTED] 10:06:48

21 [REDACTED]

22 A Sorry, say again?

23 Q [REDACTED] [REDACTED]

24 [REDACTED]

25 [REDACTED] 10:06:59

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1

A

2

3

Q

4

5

MS. BAILY: Object to form.

10:07:09

6

THE WITNESS:

7

8

BY MR. GONZALEZ:

9

Q

Would you agree that it's your number one

10

competitor in that space?

10:07:18

11

MS. BAILY: Object to form.

12

BY MR. GONZALEZ:

13

Q

I'm not trying to trap you.

14

A

Yeah.

15

Q

If somebody else is number one, I want to

10:07:20

16

know, that's all.

17

A

Yeah.

18

Q

So let me go back.

19

20

10:07:26

21

MS. BAILY: Same objection.

22

THE WITNESS:

23

24

BY MR. GONZALEZ:

25

Q

And who would you consider to be number

10:07:33

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1 basically my user research team does the surveys.

2 BY MR. GONZALEZ:

3 Q And your research team is to have -- does  
4 it have a name?

5 A They -- they basically just called it the 10:08:38  
6 user research group, yeah.

7 Q User research group?

8 A Yeah.

9 Q Not Daniel's brigade or anything like that?

10 A No. 10:08:49

11 Q All right. [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 A I don't remember the exact date.

15 Q Approximately. 10:08:58

16 A But approximately, we've done probably in  
17 the last -- I'm trying to remember -- I mean, last  
18 few months, but it's been more focused on the  
19 markets that we're interested in, yeah.

20 Q And what markets are those that you were 10:09:13  
21 more focused on?

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED] 10:09:24

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1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED] 10:09:36

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED] 10:09:53

11 MS. BAILY: Object to form.

12 THE WITNESS: It's -- well, are you talking

13 about litigation in general or like this -- this

14 litigation in specific?

15 BY MR. GONZALEZ: 10:10:08

16 Q Litigation in general.

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 Q All right. Fair enough. Let's talk about 10:10:20

21 this litigation.

22 A Yeah.

23 [REDACTED]

24 [REDACTED]

25 [REDACTED] 10:10:27

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1

2

MS. BAILY: Object to form.

3

THE WITNESS:

4

5

10:10:40

6

7

8

BY MR. GONZALEZ:

9

Q Do you ever have communications with public

10

agencies about your vehicles?

10:10:51

11

A Do --

12

MS. BAILY: Object to form.

13

THE WITNESS: Do I personally or --

14

BY MR. GONZALEZ:

15

Q Yes, you.

10:10:57

16

A Most of my efforts are more internal

17

focused.

18

Q Who at Waymo is the person who communicates

19

with public agencies to try to get approval for you

20

to be able to drive your autonomous vehicles there?

10:11:08

21

A It's probably going to be more of our

22

public policy team and our partnership teams.

23

Q And who are the people who are in charge of

24

those groups?

25

A So -- I'm trying to think. So Kevin Vosen, 10:11:20

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1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

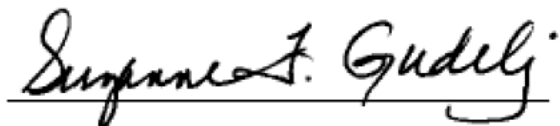
4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were duly sworn; that a record  
8 of the proceedings was made by me using machine  
9 shorthand which was thereafter transcribed under my  
10 direction; that the foregoing transcript is a true  
11 record of the testimony given.

12 Further, that if the foregoing pertains to  
13 the original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review  
15 of the transcript [ ] was [x] was not requested.

16 I further, certify I am neither financially  
17 interested in the action nor a relative or employee  
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21 Dated: 4/4/2017

22  
23 

24 SUZANNE F. GUDELJ

25 CSR No. 5111